

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Walter Louis Franklin, II, Trustee For
the Estate of Terrance Terrell
Franklin,

Court File No. 14-cv-01467 (DWF/JSM)

Plaintiff,

**DECLARATION OF
SARA J. LATHROP**

vs.

Lucas Peterson, et al,

Defendants.

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1. My name is Sara J. Lathrop. I am an Assistant City Attorney for the City of Minneapolis. I am one of the attorneys representing Defendants in this matter.
 2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the deposition of Shawn Keohen in this matter.
 3. Attached hereto as Exhibit 2 is a true and correct copy of CAPRS Report No. MP-13-132627.
 4. Attached hereto as Exhibit 3 is a true and correct copy of the MECC dispatch audio recording Incident No. 13-143770.
 5. Attached hereto as Exhibit 4 is a true and correct copy of the transcript of the deposition of David Schiebel in this matter.

6. Attached hereto as Exhibit 5 is a true and correct copy of the transcript of the deposition of Katherine Smulski in this matter.
7. Attached hereto as Exhibit 6 is a true and correct copy of CAPRS Report No. MP-13-143872.
8. Attached hereto as Exhibit 7 is a true and correct copy of the MECC dispatch Incident Detail Report for Incident No. 13-143872.
9. Attached hereto as Exhibit 8 is a true and correct copy of the transcript of the deposition of Mark Durand in this matter.
10. Attached hereto as Exhibit 9 is a true and correct copy of the transcript of the deposition of Lucas Peterson in this matter.
11. Attached hereto as Exhibit 10 is a true and correct copy of the transcript of the deposition of James Bickal in this matter.
12. Attached hereto as Exhibit 11 is a true and correct copy of the transcript of the deposition of Margaret Glirbas in this matter.
13. Attached hereto as Exhibit 12 is a true and correct copy of the transcript of the deposition of Andrew Stender in this matter.
14. Attached hereto as Exhibit 13 is a true and correct copy of the transcript of the deposition of Bamnet Woldegabriel in this matter.
15. Attached hereto as Exhibit 14 is a true and correct copy of the transcript of the deposition of Cala Scott in this matter.

16. Attached hereto as Exhibit 15 is a true and correct copy of the transcript of the deposition of Ricardo Muro in this matter.
17. Attached hereto as Exhibit 16 is a true and correct copy of a photo of the MP5 sling that was used in the incident that forms the basis of this lawsuit.
18. Attached hereto as Exhibit 17 is a true and correct copy of the transcript of the deposition of Michael Meath in this matter.
19. Attached hereto as Exhibit 18 is a true and correct copy of the transcript of the deposition of Chad DeGree in this matter.
20. Attached hereto as Exhibit 19 is a true and correct copy of the transcript of the deposition of Ann Kjos in this matter.
21. Attached hereto as Exhibit 20 is a true and correct copy of CAPRS Report No. MP-13-143770.
22. Attached hereto as Exhibit 21 is a true and correct copy of the transcript of the deposition of Kristin Jacobson in this matter.
23. Attached hereto as Exhibit 22 is a true and correct copy of the transcript of the deposition of James Gaines in this matter.
24. Attached hereto as Exhibit 23 is a true and correct copy of a printout of map showing the relative positions of 2717 Bryant Avenue South, and 2720 Bryant Avenue South, from the Hennepin County website <https://gis.hennepin.us/property/map/> last accessed May 30, 2016.

25. Attached hereto as Exhibit 24 is a true and correct copy of a video from the iPod Touch of James Gaines entitled IMG_0592.MOV.
26. Attached hereto as Exhibit 25 is a true and correct copy of the report of Plaintiff's expert Edward Primeau.
27. Attached hereto as Exhibit 26 is a true and correct copy of a video of a press conference held by Plaintiff and his attorney on May 30, 2013.
28. Attached hereto as Exhibit 27 is a true and correct copy of the transcript of the deposition of Janeé Harteau in this matter.
29. Attached hereto as Exhibit 28 is a true and correct copy of a video of a press conference held by Plaintiff and his attorney on September 26, 2013.
30. Attached hereto as Exhibit 29 is a true and correct copy of a letter from Sara Lathrop to Michael Padden.
31. Attached hereto as Exhibit 30 is a true and correct copy of a letter from Michael Padden to Sara Lathrop.
32. Attached hereto as Exhibit 31 is a true and correct copy of the transcript of the deposition of Geoffrey Wyatt in this matter.
33. Attached hereto as Exhibit 32 is a true and correct copy of the MECC dispatch Incident Detail Report for Incident No. 13-143770.

34. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date June 1, 2016.

s/ Sara J. Lathrop
Sara J. Lathrop